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Petition of Boston Edison Company, Cambridge) **D.T.E. 03-100**

Electric Light Company, and Commonwealth)

Electric Company d/b/a NSTAR Electric pursuant to)

G.L. c.164, sec.94 and 220 C.M.R. sections 5.00 et seq.,)

for Approval of a new renewable power supply offering.)

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Instructions

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness(es) receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.

4. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data complications from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
5. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
6. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department of Telecommunications and Energy (“DTE”), and a copy on William Stevens, Hearing Officer for the DTE, as well as serving the appropriate number of copies to all parties and participants on the service list in this proceeding.

Information and Document Requests

DOER 1-1

In its Response to DTE 1-2-D, the Company notes that the anticipated resource mix of the green power product for 2004 would be "22 percent biomass, 2 percent wind, and 1 percent solar" and that this estimate is "based on expected enrollment rates and because of the limited quantity of qualifying New Renewable wind and solar contained in the proposals received by the Company."

A. What enrollment rate was used to arrive at that estimate? Please report both the number of customers and amount of kilowatthours for the year 2004 in your response. Please provide all documents relied on or created to develop these calculations.

B. What quantities of qualifying New Renewable wind and solar renewable energy certificates (REC's) were contained in the proposals received by the Company.

DOER 1-2

In its Response to Comments (at 4), the Company notes that the anticipated cost to customers "would likely result in a roughly 10-15 percent price premium to participating customers."

A. Was that premium based upon the same anticipated level of participation discussed in DOER 1-1 above?

B. If not, what level of enrollment was it based upon? Please report your answer in numbers of customers and kilowatthours sold for the year. Please also provide documents relied on or created to develop these calculations.

C. What is the anticipated price premium (in dollars per kilowatthour) of the product using the anticipated enrollment in your answer to DOER 1-1? Please provide all documents relied on or created in calculating said anticipated price premium.

DOER 1-3

In its Response to DTE 1-4, the Company notes that it will make use of a separate New England Generation Information System (NE-GIS) subaccount to track REC's purchased for the green power product.

A. How does the Company plan to report to DOER and the Department end-use sales of the green power product for label disclosure and RPS compliance verification?¹

B. Please include in your answer a comparison of the Company's planned enrollment tracking method and its similarity to, and differences from, the

¹ Pursuant to 220 CMR 11.06(2) the Company must provide label disclosure and pursuant to 225 CMR 14.00 the Company must comply with RPS regulations and verify end-use sales to the satisfaction of DOER.

Electronic Business Transactions (EBT) method of tracking end-use sales used for the National Grid GreenUp Program.

DOER 1-4

The Company notes in its Filing Letter at 3 (footnote 5) that it may in the future, propose recovery of "incremental costs" from its green power customers.

A. Please describe the total cost to the Company of providing this green power product to customers. Please include in your answer which costs have been included in the 10-15 percent price premium.

B. Please provide the individual amounts and complete documentation of said amounts for each of the following costs in preparing a response to A above:

1. administrative and billing activities,
2. procurement,
3. contracting,
4. staffing,
5. regulatory compliance and third-party auditing (including tracking and reporting of enrollments and end-use sales),
6. marketing,
7. enrollment and switching activities.

C. Which of the costs in B above will likely cause the Company to seek a recovery of incremental costs? Please provide an estimate of those costs, including documents which support the Company's estimate.

D. Which of the costs in B above will neither be recovered through the price premium for the product nor the incremental cost recovery? Please provide an estimate of those costs, including documents which support the Company's estimate.

DOER 1-5

A. In developing the Company Filing, what consideration did NSTAR give to the impact of offering the NSTAR Green product on attribute-only renewable energy certificate products (such as Regen and Sterling Planet) currently offered in the NSTAR territories?

B. What did NSTAR conclude, if it considered this impact? Please provide all documents in which this question was discussed.

DOER 1-6

In its Response to DTE 1-3 (Attachment DTE 1-3), the Company notes that a "Web Page Info/Reservation List" and "Press Release" were utilized in "Pre-Launch (Fall '03)."

A. Please provide the text that was featured on the Company's Web Page describing the NSTAR program and characterizing the status of Department's approval process.

B. Please provide the text of the Press Release circulated to press agencies prior to the launch of this program and the list of recipients of that release.

C. Please provide a full description, and copies, of any other marketing or bill insert activities conducted to date with any reference to the NSTAR Green product.

D. Please report the number of customers that have requested to be added to the Company's reservation list to date.

DOER 1-7

In its Response to DTE 1-6 (at 3), the Company notes that "the Company is willing to include the names and numbers of Massachusetts licensed retail competitive suppliers or municipal aggregators that have a retail green product via a web link from the Company's NSTAR Green web page" and that "the Company is willing to withhold any direct marketing efforts of NSTAR Green to customers served by a municipal aggregator."

A. Is the Company willing to further customize its direct marketing to include the featuring of any retail green products available in the NSTAR Company territories?

B. Please include in your answer the process planned by the Company to withhold marketing of NSTAR Green in bill inserts for customers in Cape Light Compact territories as compared to customizing bill inserts for customers in the Compact area to include any suppliers with green products available only in those areas (such as a Cape Light Compact green power product).

DOER 1-8

Please provide all documents which discuss or mention NSTAR's consideration of offering a green product to its customers.

A. Specifically, provide any strategic planning documents and internal Company memos which address the naming or description of the program or discuss various approaches to providing this product.

B. Include in this response all memos to senior management, and meeting notes in preparation for, or from meetings with senior management regarding the decision to offer the product.

Respectfully submitted,

For the Commonwealth of Massachusetts

Division of Energy Resources

By its attorneys:

Robert Sydney, General Counsel,

Diane A. Langley,

Deputy General Counsel

Division of Energy Resources

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DATE: January 6, 2004

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Division of Energy Resources' First Set of Document and Information Requests was served by U.S. First Class mail to the attached Service List on this ____ of January, 2004.

Diane A. Langley